

Alaska Oil and Gas Association



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December 17, 2018

U. S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2017-0483
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington DC 20460

Re: AOGA Comments on Emission Standards for
New Reconstructed, and Modified Sources
Reconsideration

Docket ID No. EPA-HQ-OAR-2017-0483

To Whom It May Concern:

These brief comments are made on behalf of the members of the Alaska Oil and Gas Association (“AOGA”), who account for a majority of the oil and gas production and related operations in Alaska.

AOGA appreciates the willingness of the Environmental Protection Agency (EPA) to reconsider aspects of the 2016 fugitive emissions regulations at 40 CFR 60 Part OOOOa with respect to operations on the Alaska North Slope. In March, 2018, EPA determined that modified monitoring requirements were appropriate for Alaska North Slope well sites, and now proposes to extend these to Alaska North Slope compressor stations. In both cases, these actions were properly based upon the technical infeasibility of conducting fugitive emissions monitoring in the extreme cold conditions prevalent for much of the year on the North Slope.

Monitoring of such facilities in Alaska would now be required annually, while initial monitoring following start-up would be required within either 6 months or 60 days depending upon the season. AOGA believes these are positive steps which reflect recognition of the unique circumstances of operations on the North Slope of Alaska.

Respectfully submitted,

A handwritten signature in black ink that reads "Kara Moriarty".

KARA MORIARTY
President & CEO